



Kirk Macfarlane
Counsel Mid-Atlantic/Southeast/Western Regions

GE
640 Freedom Business Center
King of Prussia, PA 19406

T 610-992-7976
F 610-992-7898
Roger.florio@ge.com

Via Federal Express

December 12, 2011

Craig Whitenack, Civil Investigator
U. S. Environmental Protection Agency Region 9
Southern California Field Office
600 Wilshire Blvd., Suite 1460
Los Angeles, CA 90017

Re: Response to Request for Information Pursuant to Section 104(e) of CERCLA
Yosemite Creek Site, San Francisco, CA

Dear Mr. Whitenack:

This letter and its attachments (the "Response") are submitted on behalf of the General Electric Company ("GE") in response to the Request for Information Pursuant to Section 104(e) of CERCLA ("Request"), dated August 29, 2011, from the United States Environmental Protection Agency (US EPA) regarding the Yosemite Creek Site in San Francisco, CA. Our paralegal, Mary Sullivan, requested an extension until December 20, 2011 to respond to the Request. Ms. Thanne Cox, on behalf of EPA, granted GE the extension until December 20, 2011. We appreciate your cooperation in this matter.

In response to the Request, GE conducted a comprehensive, good faith investigation of all reasonably available information concerning facilities that operated in the Oakland and San Francisco area during the relevant time frame to locate documents or information regarding any potential nexus to the Bay Area Drum Site or the Yosemite Creek Site. This investigation has not led to the identification of any information indicating that any GE site located within the Oakland or San Francisco area ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.

GE reserves the right to amend, modify, correct, supplement or otherwise change this Response if additional information becomes available that would make such changes appropriate.

Sincerely,

Kirk Macfarlane
Counsel, Mid-Atlantic/Southeast/Western Regions

General Electric Company's Response to USEPA Request for Information
Yosemite Creek Site in San Francisco, CA

I - General Objections

- A. General Electric Company (GE) objects to the EPA information requests on the grounds that they are overbroad, unduly burdensome and seek information that is irrelevant. Much of the information requested is not reasonably related to the identification of materials treated, stored or disposed of at the Yosemite Creek site, the nature or extent of the release or threatened release at that site, or the ability of GE to pay for or to perform a cleanup of the Yosemite Creek site.
- B. GE asserts all applicable privileges and protections it has with regard to USEPA's enumerated inquiries including the attorney-client privilege, the attorney work product doctrine, materials generated in anticipation of litigation, and privileges for materials which are proprietary, company confidential, or trade secret. CERCLA does not require a party to divulge such information in response to information requests; GE objects to the requests on the grounds that the requests use undefined terms and are overbroad, vague, ambiguous, irrelevant and unduly burdensome so as to exceed statutory authority under CERCLA and contravene GE's constitutional rights. In responding to these requests, GE relies on the definition of these terms as they are commonly used (i.e., their dictionary definitions);
- C. GE objects to any requirement to produce documents or information already in the possession of a government agency, or already in the public domain. Such requirement is duplicative and therefore, unduly burdensome;
- D. GE objects to the request to the extent they call for GE to make a legal conclusion concerning GE's potential liability under CERCLA for the Site;
- E. GE objects to the requests to the extent they seek trade secrets or other confidential business information;
- F. GE objects to any requirement to produce documents or information outside of the relevant time frame. Such a requirement is overbroad, unduly burdensome and seeks information that is irrelevant.
- G. Notwithstanding and without waiving these objections, and subject to them, GE has prepared this response based upon the information available to it. Where requests are vague ambiguous, overbroad, unduly burdensome, or beyond the scope of USEPA's authority pursuant to Section 104(e) of CERCLA, GE is making appropriate and reasonable efforts to provide responsive information based on GE's interpretation of the requests. To the extent that information submitted herein is not required by law or is otherwise outside the scope of USEPA's 104(e) authority, that information is voluntarily submitted. GE waives no rights or protection of information it voluntarily submits.

GE reserves the right to amend, modify, correct, supplement or otherwise change this Response if additional information becomes available that would make such changes appropriate, although we believe that we are under no continuing obligation to make any such changes or subsequent filings. GE submits this response without admitting any liability for conditions at the Site and without waiving any defenses it may have for liability or costs incurred at the Site under law.

General Electric Company's Response to USEPA Request for Information
Yosemite Creek Site in San Francisco, CA

II - Summary of Investigation

In response to the United State Environmental Protection Agency's (USEPA's) Request for Information (Request) dated August 29, 2011, for the Yosemite Creek Site in San Francisco, CA, General Electric Company (GE) conducted a comprehensive, good faith investigation of all reasonably available information concerning facilities that operated in the Oakland and San Francisco area during the relevant time frame. EPA's counsel has confirmed that the only information that EPA has that indicates any connection between GE and the Bay Area Drum (BAD) facility, that is apparently linked to the Yosemite Creek Site, is GE's apparent purchase of reconditioned drums by the GE Oakland Facility located at 5441 14th St., Oakland CA (14th St. Facility) from 1980 to 1983. There has been no information or documentation supplied by EPA indicating that any GE facility shipped drums or containers to the BAD site for recycling, cleaning, reuse, disposal or sale. In light of this lack of information, GE believes that the Request is overly broad and unduly burdensome. The US EPA describes GE as a potential arranger, who by contract or agreement, arranged for the disposal, treatment, or transportation of PCBs and other hazardous substances at the BAD facility. Based on our investigation, GE has no records to indicate this nor has any knowledge or information that suggests GE ever contracted with BAD for disposal of any materials whatsoever. Based on the limited information provided by EPA and the lack of any indication of any other connection between GE and the BAD site, GE believes that it is appropriate to limit its response to facilities that operated in the Oakland and San Francisco area during the relevant time frame. Should EPA locate any additional information that establishes a nexus between any GE facility outside of this area and the BAD site, GE reserves the right to supplement this Response.

GE's investigation included an examination of all available, potentially relevant documents in GE's possession, custody and control as well as consultation with current and former employees believed likely to have relevant knowledge. Among the available records reviewed were records retained at records retention facilities, corporate headquarters in Fairfield, CT as well as records maintained in regional offices and internal databases. Hundreds, if not thousands, of pages of reports, letters, and waste manifests were reviewed to determine whether GE had any communication or association with the Bay Area Drum Company. Our investigation was constrained by the fact that the Request asks for information regarding GE's alleged activities that occurred more than fifty years ago. Many of the former GE facilities that operated during the relevant time period were dissolved, sold, or ceased operations more than fifty years ago. Any records that may have existed were likely destroyed years ago in compliance with record retention policies at that time. This review has not led to the identification of any information indicating that any GE site located within the Oakland or San Francisco area ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale. Unless otherwise stated, the information provided in the Responses below represents the best of GE's knowledge.

General Electric Company's Response to USEPA Request for Information
Yosemite Creek Site in San Francisco, CA

III: Responses to Requests

Subject to the General Objections stated above, General Electric Company (GE) provides the following responses to the specific requests for information.

- 1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.**

Response:

General Electric Company (GE) specifically objects to Request No. 1 on the grounds that it is overbroad, unduly burdensome and seeks information that is irrelevant. The information sought in Request No. 1 can be found in public records, SEC filings and 10K filings that are available to USEPA. Subject to and without waiving the objections, General Electric Company responds to this request by stating that GE traces its beginnings to Thomas A. Edison, who established Edison Electric Light Company in 1878. In 1892, a merger of Edison General Electric Company and Thomson-Houston Electric Company created General Electric Company. From aircraft engines and power generation to financial services, and medical imaging. GE operates in all 50 U.S. states and more than 100 countries. GE has a strong set of global businesses in infrastructure, finance and medical equipment aligned to meet today's needs, including the demand for global infrastructure; growing and changing demographics that need access to healthcare, finance, and information and entertainment; and environmental technologies. See Attachment 1, 2010 Annual Report, for further information regarding GE's business activities, products and services.

- 2. Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:**
 - a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale;**
 - b. are/were located in California (excluding locations where ONLY clerical/office work was performed); and**
 - c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).**

Response:

GE specifically objects to Request No. 2 and all of its parts on the grounds that it is overbroad, unduly burdensome and seeks information that is irrelevant. EPA's counsel has confirmed that the only information that EPA has indicating any connection between GE and the BAD site is GE's apparent purchase of reconditioned drums by the GE Oakland facility located at 5441 14th St., Oakland CA (14th St. facility) from 1980 to 1983. There has been no information or documentation supplied by EPA that indicates that any GE facility shipped drums or containers to the BAD site for recycling, cleaning, reuse, disposal or sale. In light of this lack

of any information, GE believes that the information request is overly broad and unduly burdensome.

Based on the limited information provided by EPA and the lack of any indication of any other connection between GE and the BAD site, GE believes that it is appropriate to limit its response to facilities that operated in the Oakland and San Francisco area during the relevant time frame. Should EPA locate any additional information that establishes a nexus between any GE facility outside of this area and the BAD site, GE reserves the right to supplement this Response.

In the spirit of cooperation and subject to and without waiving the objections, GE responds to Request No.2 with the following information:

To the best of our knowledge and belief, the sites listed below operated in the Oakland and San Francisco Bay Area during the relevant time period. This information was taken from GE Organizational Directories, GE Diaries, and GE Places of Business. GE has found no information or documentation that any of these GE facilities ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal or sale.

5441 East 14th St., Oakland, CA (aka 5441 International Blvd.)
Motor and Transformer Assembly and Manufacturing Plant: 1924 to 1975
Apparatus Service Shop: 1975-1995

3400 Wood St., Oakland, CA
Oakland Service Shop
Leased 1957-1977

1650 34th St., Oakland, CA
Oakland Apparatus Service Shop
Unknown dates of operation

1098 Harrison St., San Francisco, CA
Apparatus Service Shop
Leased 1944--1975

1034 66th Avenue, Oakland, CA
Wire and Cable Plant
1949-1978

971 69th Avenue, Oakland, CA
Wire and Cable Apparatus Plant
Unknown dates of operation

1648 16th St. and 1614 Campbell St., Oakland, CA
Oakland Lamp Works aka Oakland Mazda Lamp Division
1917-1961

3. Provide a **brief description of the nature of Respondent's operations** at each Facility identified in your response to Question 2 (the "Facilities") including:
- a. the date such operations commenced and concluded; and

- b. the types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

3(a) and (b) Response:

5441 East 14th St., Oakland, CA

GE purchased the undeveloped property that comprises the 14th St. Facility in 1922 and developed the property in 1923. The 14th St. Facility covers an area of approximately 24 acres. Between 1924 and 1975, GE operated a motor and transformer assembly facility and a transformer manufacturing facility at the 14th St. Facility. 10-C oil was used as the predominant dielectric fluid in the finished transformers, with PCBs also being used as a dielectric fluid in a small percentage of the finished transformers. Solvents, primarily TCE, were used during the production process to clean and degrease metal parts. GE stopped using the 14th St. Facility for the manufacture of transformers in 1975. Between 1975 and the mid-1990s, GE Apparatus Service Department operated an electrical equipment maintenance and repair operation in portions of the 14th St. Facility. After that time, the 14th St. Facility was used for temporary storage of mobile office trailers. The site is currently vacant, fenced and has on-site security 24 hours a day. The site is currently undergoing remediation under a consent order with the State of California Department of Toxic Substances Control.

3400 Wood St., Oakland, CA

3400 Wood Street was an electrical equipment maintenance and repair facility which mainly serviced transformers. GE leased the site between 1957 and 1977. Few records exist for this property. In an environmental assessment conducted in 1991, one entity, Meyers Container Corp., is described as a neighboring site which had major releases of hazardous materials because of poor housekeeping practices. Myers was located approximately ¼ mile north of GE's property and groundwater flow at the site was determined to be to the west. Myers is one of the entities under investigation by the USEPA (Request No. 25); however, there is no indication that GE contracted with or used their services. See Document Index, Attachment 2.

1650 34th St., Oakland, CA

No information was located regarding this facility.

1098 Harrison St., San Francisco, CA

This facility operated as an electrical equipment maintenance and repair facility from 1944 to 1975. This was apparently a leased location. The facility operations moved to the 14th St. facility in September 1976.

Wire and Cable Plant - 1034 68th Avenue

GE operated at 1034 66th Avenue from at least 1949 to 1981. The operations at the site involved coating copper wire with plastic for wire insulation. Few records exist for this property. The facility closed due to an overcapacity problem aggravated by the then current recession. The property was sold to Dunavant Enterprises in 1981.

Oakland Lamp Works 1614 Campbell St. / 1648 Sixteenth St., Oakland, CA

The Oakland Lamp Works, also known as the Oakland Warehouse Company and Oakland Mazda Lamp Division, began production of incandescent lamps in 1912. Oakland Lamp Works occupied the entire block bounded by Campbell, Peralta, 16th and 17th Streets in West Oakland. The main buildings included an L-shaped three-story brick building fronting on Campbell and 16th St., a one-story brick warehouse on Peralta St. and a two-story wooden building along 17th St. The Campbell St. building was constructed in 1910 and a matching addition along 16th St. was built in 1917. The wood building was constructed in 1916 and the brick warehouse was constructed in 1926. Production at Oakland Lamp Works ceased in 1961 when GE consolidated operations in Ohio and New Jersey. In 1963 the buildings were taken over by the California Cotton Mills, a historic industry, for the manufacture of twine, rope and maps. They remained in business until 1980. See Document Index, Attachment 2.

4. **For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.**

Response:

5441 East 14th St., Oakland, CA

Based on our investigation and to the best of our knowledge and belief, responsive documents for the 14th St. facility relate to the purchase of PCBs from Monsanto Industrial Chemicals Co. (Monsanto) historically, and records regarding the equipment servicing and decommissioning business activities conducted during the 1980's. These records are being produced with this response. Please see Attachment 2, Document Index. In addition, there are several documents prepared during the investigation and cleanup of the facility that described reported historic storage, purchasing and use of transformer oils at the facility. These documents are referenced in Attachment 2, Document Index, Response No. 5 and No. 6.

Based on our investigation, no records or information were found regarding the storage, production, processing, use or disposal of SOI during the Relevant Time Period at the other facilities identified in Response No. 2.

5. **For each Facility, provide a complete description of where drums or other containers were sent for disposal or reconditioning and the circumstances under which the drums or other containers were removed from the Facility for either purpose. Describe any changes in Respondent's practices regarding drum disposal or reconditioning over time.**

Response:

5441 East 14th St.:

According to a report done in 1981 by Brown and Caldwell, no written information or documentation exists relative to historic waste disposal practices at the 17th St. facility. Based on hearsay information developed by Brown and Caldwell, drums reportedly may have been

used starting in the early to mid-1960s for test sample disposal. Brown and Caldwell reported that waste oil may have been stored in drums and disposed of through scrap-oil dealers.

10-C oil reportedly was removed, filtered, and placed back into transformers when the 14th St. facility performed maintenance and repair activities between 1975 and the mid-1990s. In cases where the transformer was considered beyond repair and discarded, the 10-C oil was drummed and stored for appropriate disposal. The disposal procedure (for which we have not located additional information) was followed for all oil filled transformers that may have been subsequently contaminated with PCBs. Please see Attachment 2, Document Index, Response 5 and 6.

See also Response No. 4.

- 6. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store PCBs (including any substances or wastes containing the PCBs) at any of the Facilities? State the factual basis for your response.**

Response:

5441 East 14th St.

GE purchased, used and stored PCBs in conjunction with the manufacture of transformers at the 14th St. Facility. Use of the insulating fluid Pyranol as a transformer dielectric fluid, consisting of equal portions of PCBs and trychlorobenzenes, reportedly began in the early 1930s and peaked in the mid-1950s. During the manufacturing process, Pyranol was pumped to tanks, tested, stored, reprocessed by filtering and transported by vehicle and pipes.

In the 1930s, GE installed two 5,000 gallon above-ground oil tanks which were used exclusively for Pyranol storage. The tanks were installed at the northeast corner of what was then Building 2. (These tanks were subsequently relocated in 1976 and used for waste oil storage). Pyranol was pumped from 5,000 gallon tank cars into two storage tanks to the assembly area in Building 1, which was one of the original buildings constructed by GE for the assembly of transformers.

In 1948, a storage facility for transit oil 10C was built. The facility consisted of several tanks in a walled concrete enclosure. All 10-C oil arrived in 10,000 gallon tank cars. One tank in the storage facility was used to store waste pyranol oil.

After 1968, when transformer production at the site ceased, only a minimal amount of Pyranol was used on site for the repair of warrantied transformers. Some Pyranol and Pyranol-contaminated fluids were stored on-site until 1975 when all remaining fluids were returned to Monsanto. The last year of PCB use at the 14th St. Facility was in 1975 when the facility closed. The Pyranol tanks were decommissioned, cleaned and relocated as waste oil storage tanks (not Pyranol).

A tank farm was located near the center of the 14th St. Facility. Waste Pyranol was stored in this tank farm prior to removal from the site by an outside contractor. The tank farm consisted of eleven tanks when the facility closed in 1975. Eight of these tanks held 10-c oil.

PCBs were shipped by rail to the facility and stored in tanks at the facility.

The equipment service facility located at 1098 Harrison St., San Francisco, CA- moved to the 14th St. Facility in September 1976 and operated there through the early 1990s. The facility provided electrical and mechanical repair for medium to large industrial and utility equipment manufactured by GE until 1995. Transformer repairs were limited to those using 10-C oil only. The 10-Coil was removed, filtered, and placed back into the transformer. In cases where the transformer was beyond repair and discarded, the 10-C oil was drummed and stored for appropriate disposal. PCBs may have been present as a result of servicing certain oil filled transformers that had subsequently become contaminated with PCBs. The 14th St. Facility also served as a short-term storage facility for various company products.

See also Response 4.

7. **If the answer to Question 6 is yes, specifically identify each PCB substance, or substance or waste containing PCBs, produced, purchased, used, or stored at each Facility.**

Response:

5441 East 14th St.

PCBs were purchased from Monsanto from approximately the 1930's to 1975. Monsanto was GE's sole supplier. See also Response to Question No. 6 and Attachment 2, Document Index.

See also Response 4.

8. **If the answer to Question 6 is yes, identify the time period during which each PCB substance, or substance or waste containing PCBs, was produced, purchased, used, or stored at each Facility.**

Response:

See Responses to Requests 4, 6 and 7.

9. **If the answer to Question 6 is yes, identify the average annual quantity of each PCB substance, or substance or waste containing PCBs, produced, purchased, used, or stored at each Facility.**

Answer:

5441 East 14th St., Oakland, CA

Based on our investigation, we were able to locate information that apparently describes the quantity of PCBs purchased by GE from Monsanto. EPA's Request also provided a letter from Monsanto to EPA regarding sales of PCBs. See Attachment 2, Document Index.

See also Response 4.

10. **If the answer to Question 6 is yes, identify the volume of each PCB substance, or substance or waste containing PCBs, disposed by the Facility annually and describe the method and location of disposal.**

Answer:

5441 East 14th St.

According to a report done in 1981 by Brown and Caldwell, no written information or documentation exists relative to historic waste disposal practices at the 14th St. facility. Based on hearsay information developed by Brown and Caldwell, wastes were typically buried on site from the early 1940s until the early to mid-1960s. According to the Brown and Caldwell report, these practices ceased in the early to mid-1960s when it became plant practice to store waste oil in drums and dispose of it regularly through scrap-oil dealers.

Based on our investigation, for the period September 1976 to April 1978, pyranol was disposed through the Nuclear Engineering Company Inc. The last pyranol was shipped from 5441 E. 14th St. on April 12, 1978. Solid PCB waste was disposed at Casmalia Disposal in Santa Barbara, CA. Additionally, PCB items reports and records of materials shipped in the 1980s provide that materials continued to be disposed at Casmalia landfill.

Based on our investigation and to the best of our knowledge and belief, GE sent PCB liquids and solids, PCB transformers and capacitors, PCB circuit breakers, PCB waste materials, and empty drums from customers to permitted hazardous waste facilities in the 1980's. The materials were transported and disposed of in accordance with regulations and permits issued to GE by the California Department of Health Services.

The materials were transported by:

Transporter	Location	EPA ID
B.C. Services	Rio Vista, CA	CAD000389973
Chemical Waste Management Inc.	Coalinga, CA	CAD003986718
Chemical Waste Management Inc.	Alviso, CA	Permit No. HQ-81-002
GE		CAD009208075
Tri-State Motor Transit Co.	Joplin, MO	MOD095038998
Universal Industrial	Antioch, CA	CAT080031453

The materials were taken to the following facilities:

TSD Facility	Location	EPA ID
Casmalia Disposal	Santa Barbara, CA	CAD0020748125
Chemical Waste Management Inc	Emelle, AL	ALT000622464
Chemical Waste Management Inc	Coalinga, CA	CAT00646117
Chemical Waste Management Inc	Alviso, CA	
ENSCO	El Dorado, AK	ARD069748192
GE c/o Pacific State Steel	Union City, CA	CAP080012982

GE	Denver, CO	COD062753702
Kettleman Hills	Kettleman Hills, CA	CAT000646117
Union City		CAD02748125

Please see Attachment 2, Document Index, for additional details regarding the above.

As a result of our investigation we located PCB Log Reports for PCB processing and disposal between 1984-1989 from American Environmental Management as part of the decommissioning work done on customers' PCB equipment in the 1980's. Please see Attachment 2, Document Index.

See also Response 4.

- 11. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities? State the factual basis for your response to this question.**

Response:

5441 East 14th St.

In conjunction with production of transformers and the service and repair activities, GE purchased, used or stored transformer oil.

No information regarding production, purchase, use or storage of hydraulic oil or transformer oil was located for any of the other facilities identified in Response No. 2.

- 12. If the answer to Question 11 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.**

Response:

5441 East 14th St.

Based on our investigation, 10C oil was purchased, used and stored as part of the manufacture of transformers and the service and repair activities at the 5441 East 14th St. facility. See Responses to Question No. 4 and 6.

- 13. If the answer to Question 11 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.**

Response:

5441 E. 14th St.

Based on our investigation, transformer oil was purchased, used and stored during the manufacture of transformers from 1924 to 1975 and during the service and repair operations after 1975. See Response No. 4 and 6.

14. If the answer to Question 11 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.

Response:

5441 East 14th St.

As a result of our investigation, GE has not identified any documents regarding quantity of hydraulic oil or transformer oil purchased, produced, used, or stored at this facility other than provided in Response No. 2 and 9.

15. If the answer to Question 11 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and describe the method and location of disposal.

Response:

See Response No. 10 and 14.

16. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 6 and 11:

- a. Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;
- b. Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;
- c. State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time; and
- d. Describe how, where, when, and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.

Response:

- a. See Response No. 6.
- b. See Response No. 7.
- c. See Response No. 6.
- d. See Response No. 5, 6 and 10.

17. For each container that Respondent used to store a SOI or in which SOIs were purchased ("Substance-Holding Containers" or "SHCs") that was removed from the Facility, describe Respondent's contracts, agreements, or other arrangements under

which SHCs were removed from the Facility, and identify all parties to each contract, agreement, or other arrangement described.

Response:

5441 E. 14th St.

As part of the equipment decommissioning business operations in the 1980's, GE had an agreement with American Environmental Management Corporation, Rancho Cordova, CA, dated August 1985. The purpose of the agreement was (1) to provide GE with arrangements for availability and preferential utilization of a permitted facility in Northern California at which GE could temporarily store and process PCB material from various customers in preparation for legal disposal and (2) to permit both parties to provide services to a joint customer, Pacific Gas and Electric (PG&E) through joint pick-up of waste materials to be separately handled by GE and AEM. Please see Attachment 2, Document Index.

18. **Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.**

Response:

GE has not been able to locate information on individuals who had procurement responsibilities.

19. **Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:**
- a. the type of container in which each type of waste was placed/stored; and
 - b. how frequently each type of waste was removed from the Facility.

Describe any changes in Respondent's practices over time regarding the collection and storage of waste containing SOIs.

Response:

- a. See Response No. 6.
- b. See Response No. 10.

20. **For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.**

Response:

See Response No. 17.

21. **Identify all individuals who currently have, and those who have had, responsibility for Respondent's environmental matters in California (including responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.**

Response:

Former employees were identified who may have had some waste management responsibilities and/or knowledge of such activities during the Relevant Time Period. They include:

- Robert Delay, Plant Manager at 5441 E. 14th St. Facility (1980)
- Ron Desgroseilliers, Project Manager (1981)
- Karl Lathrop, Project Manager
- Paul Schatz, Manufacturing Engineer (1979-198?)
- Ted Evans, PCB Specialist

GE has not been able to locate contact information for any other former employees who may have been associated with one or more of the GE facilities within the San Francisco and Oakland area during the Relevant Time Period. However, based on our findings, there is no basis to conclude that any of the facilities listed in Response No. 2 and described in Response No. 6 arranged for the disposal of any hazardous substances that were disposed of at the BAD facility and/or released to the Yosemite Creek Site.

22. **Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner in California? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.**

Response:

See Response No. 1. Based on our investigation, the only documents GE has located regarding purchases of drums from a drum recycler or reconditioner by any of the facilities identified in Response No. 2 are the documents EPA provided with its information request.

23. **Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?**

Response:

No information was found responsive to this request.

24. **Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et seq., or comparable state law; all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq. where (a) PCBs were addressed by the cleanup and (b) at which Respondent paid a portion of cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies PCBs and (b) is related to one of the above-mentioned sites.**

Response:

General Electric Company (GE) specifically objects to Request No. 24 on the grounds that it is overbroad and unduly burdensome and not relevant to the Site. As EPA is aware, GE has been involved in numerous cleanup sites under federal and state law where PCBs were addressed. The information sought in Request No. 24 is not reasonably related to the identification of materials treated, stored or disposed of at the BAD Site or the Yosemite Creek Site, the nature or extent of the release or threatened release at those sites, nor the ability of GE to pay for or to perform a cleanup of the Yosemite Creek site. The 14th St. facility is the subject of an approved environmental cleanup pursuant to an administrative consent order with, and under the oversight of, the State of California Department of Toxic Substances Control. In connection with this cleanup activity, there are numerous soil, groundwater, and indoor air investigation and remediation reports related to the property. Please refer to the CADTSC database, Envirostor at <http://www.envirostor.dtsc.ca.gov/public/>.

25. **Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company; Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California.**

Response:

No records were located with respect to communications between GE and the entities identified in this request related to any of the facilities identified in Response No. 2.

GE found one record of communication between GE and the Waymire Drum Company. This record was found during GE's investigation conducted in response to a Request for Information for the Cooper Drum Superfund Site, Los Angeles CA. This record is an "empty drum receiving record" indicating that GE Betz, located in Compton, CA purchased 19 reconditioned drums from Waymire Drum Co., Inc., 9316 Atlantic Avenue, South Gate, CA 90290. The drums are certified as being "empty". GE Betz did not locate any records that it did any other business with Waymire Drum Co. other than this purchase.

26. **Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used, or stored at the Facilities.**

Response:

5441 E. 14th St.

GE did not locate documents prior to 1979-1980 regarding SOIs that were produced, purchased, used or stored at the 14th St. Facility other than general information and documents referenced in Response No. 4, 6 and 10.

During its investigation, GE did not locate any documents related to the other facilities listed in Response No. 2 regarding SOIs produced, purchased, used or stored.

27. Provide copies of all documents containing information responsive to the previous twenty-six questions and identify the questions to which each document is responsive.

Response:

GE is providing a CD (Attachment 3) holding scanned documents supporting our responses. The Document Index, Attachment 2, describes the responsive documents by date, author, subject, bates number range, and the specific questions to which documents are related.

ATTACHMENT 1

General Electric 2010 Annual Report



ATTACHMENT 2

Document Index

Attachment 2: Document Index
General Electric 104(e) Response
Yosemite Creek Site

BATES NO. START	BATES NO. END	LOCATION	DATE	DOCUMENT TITLE	REQUEST NO.
YOS_OAK_00001	YOS_OAK_00005	5441 E. 14th St.	12/12/1980	Application for Operating Permit for Facilities Receiving Hazardous Waste	4, 10
YOS_OAK_00006	YOS_OAK_00071	5441 E. 14th St.	1981	CA Extremely Hazardous Waste Disposal Permits, Permit Applications, Manifests and related Documents	4, 10
YOS_OAK_00072	YOS_OAK_00146	5441 E. 14th St.	1982	CA Extremely Hazardous Waste Disposal Permits, Permit Applications, Manifests and related Documents	4, 10
YOS_OAK_00144	YOS_OAK_00153	5441 E. 14th St.	1983	Applications for CA Extremely Hazardous Waste Disposal Permit, CA Extremeley Hazardous Waste Disposal Permits, CA Hazardous Waste Manifests and related documents	4, 10
<i>The above four items are contained within the first pdf labeled YOS_OAK_00001 to 00153</i>					
YOS_OAK_03283	YOS_OAK_03251	5441 E. 14th St.	1981	CA Extremeley Hazardous Waste Disposal Permits, CA Hazardous Waste Manifests, Miscellaneous documents, 1981 Hazardous Waste Management Operating Record	4, 10
YOS_OAK_03352	YOS-OAK_03363	5441 E. 14th St.	1981	IT Transportation Corp Service Order	4, 10
YOS_OAK_03364	YOS-OAK_03368	5441 E. 14th St.	1981	IT Transportation Corp Service Order	4, 10
YOS-OAK_03369	YOS-OAK_03370	5441 E. 14th St.	1981	IT Transportation Corp Service Order	4, 10
YOS-OAK_03371	YOS-OAK_03380	5441 E. 14th St.	1981	IT Transportation Corp Service Order	4, 10
YOS-OAK_03381	YOS-OAK_03385	5441 E. 14th St.	11/25/1981	Hazardous Waste Manifest State of Arkansas	4, 10
YOS-OAK_03386	YOS-OAK_03392	5441 E. 14th St.	11/30/1981	Hazardous Waste Manifest State of Arkansas	4, 10
YOS-OAK_03393	YOS-OAK_03398	5441 E. 14th St.	12/17/1981	Universal Industrial Services Inc Work Order	4, 10
YOS-OAK_03399	YOS-OAK_03402	5441 E. 14th St.	1981	Hazardous Waste Management Operating Record Aug 1981 to Sept 1981	4, 10
YOS-OAK_03403	YOS-OAK_03411	5441 E. 14th St.	1984	AK Waste Manifest and Compliance Certificate; Tri-State Motor Transit shipment	4, 10
YOS-OAK_03412	YOS-OAK_03413	5441 E. 14th St.	1984	Hazardous Waste Management Operating Record March 1984	4, 10
YOS_OAK_	YOS_OAK_	5441 E. 14th St.	1982	Applications for CA Extremely Hazardous Waste Disposal Permit, CA Extremeley Hazardous Waste Disposal Permits, CA Hazardous Waste Manifests and related documents	4, 10
YOS_OAK_00165	YOS_OAK_00210	5441 E. 14th St.	1985 to 1987	General Correspondence to and from GE and American Environmetnal Management Corporation	4, 10
YOS_OAK_00211	YOS_OAK_00354	5441 E. 14th St.	Feb-87	1985 Annual Report for PCB Activities	4, 10
YOS_OAK_00355	YOS_OAK_00941	5441 E. 14th St.	Dec-87	1986 Annual Report for PCB Activities	4, 10
YOS_OAK_00942	YOS_OAK_01475	5441 E. 14th St.	Feb-87	1986 Annual Report for PCB Activities	4, 10
YOS_OAK_01476	YOS_OAK_01990	5441 E. 14th St.	Feb-88	1987 Annual Report for PCB Activities	4, 10
YOS_OAK_01991	YOS_OAK_02623	5441 E. 14th St.	Apr-89	1988 Annual Report for PCB Activities	4, 10
YOS_OAK_02624	YOS_OAK_03281	5441 E. 14th St.	Apr-90	1989 Annual Report for PCB Activities	4, 10
YOS_OAK_03414	YOS_OAK_03415	5441 E. 14th St.	24-Oct-79	PCB's and Control of PCBs and PCB Items with Appendix F, GE Memo	4, 10
YOS_OAK_03416	YOS_OAK_03419	5441 E. 14th St.	1-Jul-80	Annual Report 1979 PCBs and PCB Items Out of Service	4, 10
YOS_OAK_03420	YOS_OAK_03421	5441 E. 14th St.	1980	Annual Report 1980 PCBs and PCB Items In-Service	4, 10

Attachment 2: Document Index
General Electric 104(e) Response
Yosemite Creek Site

BATES NO. START	BATES NO. END	LOCATION	DATE	DOCUMENT TITLE	REQUEST NO.
YOS_OAK_03422	YOS_OAK_03425	5441 E. 14th St.	1982	Appendix B Form 1 Quarterly Record of PCB Liquids May and July 1982	4, 10
YOS_OAK_03426	YOS_OAK_03431	5441 E. 14th St.	1981-1982	Appendix B Form 2 Record of PCB Material Received 1/28/1981 to 7/29/1982	4, 10
YOS_OAK_03432	YOS_OAK_03460	5441 E. 14th St.	1980-1982	Appendix B Form 3 Record of PCB Material Shipped 1/4/1980 to 7/12/1982	4, 10
YOS_OAK_03461	YOS_OAK_03468	5441 E. 14th St.	1981-1985	Appendix B Form 4 Year End PCB Material on Hand Report 4Q1981 to 12/31/1985	4, 10
YOS_OAK_03469	YOS_OAK_03487	5441 E. 14th St.	24-May-79	Appendix F - PCB, PCB Items Records, listing items from 5/24/1979 to 7/12/1982	4, 10
YOS_OAK_03488	YOS_OAK_03501	5441 E. 14th St.	4-Jan-80	Appendix F - PCB, PCB Items Records, listing items from 1/4/1980 to 12/22/1982	4, 10
YOS_OAK_03502	YOS_OAK_3561	5441 E. 14th St.	none	General Electric Oakland, California	6
YOS_OAK_03562	YOS_OAK_03563	5441 E. 14th St.	6-Dec-79	PCB Contamination Complaint, GE Memo	6
YOS_OAK_03564	YOS_OAK_03566	5441 E. 14th St.	23-Oct-80	Response to Request for Comments	4
YOS_OAK_03567	YOS_OAK_03567	5441 E. 14th St.	24-Nov-80	Removal of All PCB Contaminated Material from Oakland Shop, GE Memo	4
YOS_OAK_03568	YOS_OAK_03571	5441 E. 14th St.	3-Apr-81	Letter from Monsanto to GE with information re: PCB Sales Summaries for GE Oakland CA	4, 7, 9
YOS_OAK_03572	YOS_OAK_03965	5441 E. 14th St.	1-May-81	Final Phase II Report Problem Definition by Brown and Caldwell	5, 6, 10
YOS_OAK_03966	YOS_OAK_03969	5441 E. 14th St.	1-Jun-81	Draft GE Oakland Plant Site Research and Development Program	4
YOS_OAK_00154	YOS_OAK_00164	5441 E. 14th St.	8/5/1985	Agreement for Handling, Transportation and Disposal of Hazardous Waste Material	17
Documents prefaced with YOS_LMP refer to the Oakland Lamp Works and Mazda Lamp Works located at 1614 Campbell St.					
YOS_LMP_00001	YOS_LMP_00001	Oakland Lamp	12/11/2007	GE Oakland Project - summary of research into Oakland Lamp Plant Facility	3
YOS_LMP_00002	YOS_LMP_000094			Collection of Information on Oakland Lamp Works: Historic Resources Inventories, Oakland Cultural Heritage Surveys, Floor Plans and News Articles related to GE and Oakland Lamp Division	3
YOS_LMP_000095	YOS_LMP_000101		Mar-07	Community Profile Reliance Upholstery Site 1614 Campbell Street	3
YOS_LMP_000102	YOS_LMP_000016		undated	Voluntary Cleanup Agreement in the Matter of Reliance Upholstery	3
Documents prefaced with YOS_WOO refer to the Oakland Service Shop located at 3400 Wood St., Oakland					
YOS_WOO_00001	YOS_WOO_00008	3400 Wood St.	8/8/1991	Environmental Site Assessment (partial copy-additional pages not available)	3

ATTACHMENT 3

CD holding scanned documents supporting GE responses

